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10 Attorney for Defendant
11 ANGEL SANTIAGO RIVERA

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:21-CR-00179-TLN
16 Plaintiff,)
17 v.) **STIPULATION AND ORDER TO
18 ANGEL SANTIAGO RIVERA) CONTINUE STATUS CONFERENCE AND
19 Defendant.) EXCLUDE TIME**
20) Date: September 22, 2022
21) Time: 9:30 a.m.
22) Judge: Troy L. Nunley
23)

24 IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States
25 Attorney, through James Conolly, Assistant United States Attorney and attorney for Plaintiff,
26 and Heather Williams, Federal Defender, through Assistant Federal Defender, Noa E. Oren, that
27 the status conference for September 22, 2022 be continued to October 27, 2022 at 9:30 a.m.

28 The reason for this continuance is to allow defense counsel additional time to review
discovery and investigate avenues for mitigation. The government has offered a plea in this case
and defense counsel requires additional time to review the offer with her client.

29 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
30 excluded from the date of the parties stipulation through and including October 27, 2022;
31 pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order
32 479, Local Code T4 based upon continuity of counsel and defense preparation.

1 Counsel and the defendants also agree that the ends of justice served by the Court
2 granting this continuance outweigh the best interests of the public and the defendants in a speedy
3 trial.

4 DATED: September 19, 2022

5 Respectfully submitted,
6 HEATHER E. WILLIAMS
7 Federal Defender

8 _____
9 */s/ Noa E. Oren*
10 NOA E. OREN
11 Assistant Federal Defender
12 Attorney for Defendant
13 ANGEL SANTIAGO RIVERA

14 DATED: September 19, 2022

15 PHILLIP TALBERT
16 United States Attorney

17 _____
18 */s/ James Conolly*
19 JAMES CONOLLY
20 Assistant United States Attorney
21 Attorney for Plaintiff

ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing, adopts the stipulation in its entirety as its order. The Court specifically finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendants in a speedy trial.

The Court orders the status conference scheduled for September 22, 2022 be continued to October 27, 2022 at 9:30 a.m. The Court orders the time from the date of the parties' stipulation, up to and including October 27, 2022, excluded from computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. §§3161(h)(7), and Local Code T4.

DATED: September 19, 2022


Troy L. Nunley
United States District Judge

Troy L. Nunley
United States District Judge